

AO91 (Rev. 12/03) Criminal Complaint

FELONY

AUSA

United States Courts

Southern District of Texas

UNITED STATES DISTRICT COURT

FILED

October 19, 2021

Southern District Of Texas Brownsville Division

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

vs.

Case Number: 1:21-MJ- 981

Emilia GALLEGOS-Aviles
A220 677 998 United States Citizen

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about October 17, 2021 in Cameron County, in

the Southern District Of Texas defendant(s)

knowingly, willfully, and in reckless disregard of the fact that one (1) undocumented alien had entered the United States in violation of law and remained in the United States in violation of law, did transport and move said alien by means of a motor vehicle with intent to further their unlawful presence,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii)

I further state that I am a(n) Border Patrol Agent and that this complaint is based on the

following facts:

On October 17, 2021, at approximately 06:05pm, a grey in color Dodge Ram 1500 approached the Hwy 4 Checkpoint in Brownsville, Texas. The motor vehicle was being driven by a female driver, later identified as Emilia GALLEGOS-Aviles. Also in the vehicle was a male sitting in the passenger side of the vehicle, later identified as Juan Gerardo QUISTIAN. Upon inspection of the vehicle passengers, it was determined that GALLEGOS was a U.S. Citizen and QUISTIAN was a Mexican National illegally in the United States. Later at the Fort Brown Border Patrol Station and after further investigation it was determined that GALLEGOS was attempting to smuggle subject QUISTIAN for monetary gain by means of a motor vehicle with intent to further his unlawful presence.

Subject QUISTIAN had \$15 USD and \$1550 Mexican Pesos at the time of arrest.

Continued on the attached sheet and made a part of this complaint:

☐ Yes

☒ No

[Signature]
Signature of Complainant

Troncoso, Jose L. Border Patrol Agent
Printed Name of Complainant

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, on

October 19, 2021
Date

at Brownsville, Texas
City/State

Ronald G. Morgan U.S. Magistrate Judge
Name of Judge Title of Judge

[Signature]
Signature of Judge